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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

DECLARATION OF B. JOY WASSON

B. Joy Wasson declares, under penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. My name is B. Joy Wasson.
2. I am over the age of 18 and competent to testify if called on to do so. I have personal knowledge of the facts reported herein.
3. This Declaration supplements my previous declaration of July 30, 2020 (Doc. 755, Ex. 2).
4. I am a registered voter in DeKalb County, Georgia, and a member of the Coalition for Good Governance.

Absentee Ballots Necessary but Problematic

5. Since I learned of the cybersecurity threat potential, unreliability, and unverifiability of Georgia's electronic voting system through my attendance at SAFE Commission and legislative hearings, and through direct observation poll watching, despite the inconvenience of obtaining and voting a mail ballot, I have felt compelled to vote absentee — the only way I am able to vote a hand marked paper ballot that, unlike a BMD printed ballot, can be audited or recounted in an election contest. During the pandemic this has also been a safer way to vote from a health standpoint. Requesting, obtaining and returning a mail ballot and tracking its progress are time-consuming but necessary efforts. I am willing to experience the added inconvenience and additional investment of time and uncertainty for the ability to cast an effective vote on a hand marked ballot.
6. When I request and vote a mail ballot, I track my application, and ballot receipt near daily on Georgia's My Voter Page (MVP) or I check the Secretary of State's absentee files. I want to be certain that my application is accepted and that the ballot is in the mail to me, and then that my voted ballot has been received and accepted for counting. I know there are often delays in processing the applications and ballots in DeKalb County, which create cause for my concern.
7. On October 22, 2020 I had decided to take my absentee ballot to the DeKalb Elections Office drop box for the November 3, 2020 election. I had a time crunch and while I was very familiar with the process of voting the ballot and putting it in a secrecy sleeve, in my haste I forgot and put the ballot in the outer envelope without first putting it in the white inner envelope. The next day when this suddenly occurred to me that I perhaps hadn't used the inner envelope, I looked at the photograph I took of my sealed ballot envelope at

the drop box and I could see the ballot printing bleeding through the outer envelope which wouldn't have been visible with the extra secrecy envelope. I was horrified that I had done this and feared that my ballot might be rejected without using the inner envelope as directed and required by law. I looked at my email and checked MVP sometimes more than once in a day as I did not want to miss a notice of ballot rejection. For me, the time and trouble of these numerous additional steps and inconveniences of voting by mail ballot are worth it versus the electronic voting risk of BMDs.

8. There were many elections in the 2020 election cycle including special elections and runoffs, and it was very challenging for me to keep track of which elections I had requested ballots for since I am not eligible to request for an entire cycle and must ask for each election separately. I also was eligible to vote in a September 29, 2020 special election for Congressional District 5 to finish the late John Lewis' term. I voted by mail absentee in September but I realized I had not requested my ballot for the Dec 1 run off for that election so I didn't email my request form to DeKalb until November 24, 2020, a little later than I would have liked. I never received confirmation of that request nor a ballot so I was forced to vote in person on Dec 1st.
9. The Dec 1, 2020 runoff election was a low turnout election. There were no other voters voting when I went to the ballot marking device at my polling place, Neighborhood Church (Lin Mary Lin Precinct). I was very uncomfortable voting, especially because the poll workers behind me were close enough to see my touchscreen. There were many poll workers wanting to be helpful, shouting directions, but I did not want to be distracted. I took my ballot from the printer and immediately turned it face down as I walked to the scanner. The poll worker at the scanner was trying to stop me and telling me to turn it

face up, which would have made my choices visible to the poll worker. I stated that I believed it would scan either way. She said “oh, you’re right.”

10. After I left the polling place I realized I had been so distracted that I hadn’t checked my print out to see that it had my choice and I was upset because I knew it was important.
11. While I have no way of knowing what vote I actually cast since it was encoded in the QR code on the ballot, I know that if a BMD ballot were ever hand counted, the printed text would count. But because I was distracted and didn’t check, I have no way of knowing if my vote as printed in the text even reflected my choice. If I had been able to go in the polling place and hand mark a ballot, I would have been able to have my right to ballot secrecy honored and I would have had the confidence that my ballot reflected my intent.
12. I have a strong preference to be able to vote at my local precinct on Election Day on an auditable hand marked paper ballot. I enjoy voting in person for the community interaction and shared sense of civic duty. Waiting until Election Day to vote would give me the benefit of making a decision based on the very latest information on the candidates. However, with the BMD voting system there are too many downsides and risks for me to vote on Election Day unless I have no other choice.
13. The Poll Pad operation on Election Day is particularly at risk of failure as I have observed in my poll watching and have learned in my work with Coalition for Good Governance. I would not wish to subject myself to the risk of pollbooks errors and operation failures which I know can result in long lines and having to vote a provisional ballot.
14. Given the risks of Election Day voting using the Poll Pads and Dominion BMDs, including the loss of secrecy in voting, I generally choose to accept the frustrations and

certain disadvantages of voting by mail ballot on an auditable ballot and deposit it in a drop box close to Election Day.

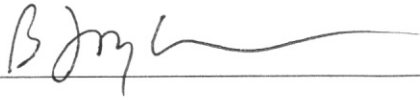
15. One of the serious disadvantages of voting by mail ballot is the legal prohibition on voting a mail ballot on Election Day. In fact the balloting materials I receive in the mail from DeKalb County contain a warning notice (Exhibit 1) in red capital letters saying:

“ALTHOUGH GEORGIA LAW PROHIBITS ANYONE FROM VOTING AN ABSENTEE BALLOT ON PRIMARY OR ELECTION DAY, IT DOES NOT PROHIBIT A PERSON FROM MAILING AN ABSENTEE BALLOT WHICH HAS ALREADY BEEN VOTED ON THAT DAY;”

Not being permitted to vote a mail ballot with the most current information is a disadvantage I must accept to vote an auditable hand marked paper ballot.

16. Another disadvantage of voting by mail is the necessity of tracking my ballot through the process on my MVP page, to determine if my application has been received, accepted, ballot issued, and then received once I return it. Ballot issuance and receipt accounting has been delayed and error prone in DeKalb County quite frequently based on my personal observations, so I carefully monitor the progress of my ballot, making the effort to review my MVP record multiple times. Unfortunately, applications are not always processed timely and ballots are not always issued as I have seen often and experienced firsthand for the Dec 1st run off. Voting in my neighborhood polling place on Election Day would be far less trouble.

Executed on this date, February 12, 2021.

A handwritten signature in black ink, appearing to read "B. Joy Wasson", is written over a horizontal line.

B. Joy Wasson